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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

ELIA GARCIA,

Plaintiff,

vs.

LINCOLN LIFE ASSURANCE COMPANY
OF BOSTON,

Defendant.

Case No.: 2:21-CV-00438

**JOINT STIPULATION TO EXTEND
THE TIME FOR DEFENDANT TO
RESPOND TO PLAINTIFF'S MOTION
TO COMPEL AND PLAINTIFF'S
MOTION TO STRIKE**

SECOND REQUEST

Plaintiff Elia Garcia ("Plaintiff") and Defendant Lincoln Life Assurance Company of Boston ("Defendant"), by and through their undersigned counsel, hereby stipulate and agree to an additional seven (7) day extension of time, through and including **August 2, 2022**, for Defendant

to respond to Plaintiff's Motion to Strike Experts Dr. Korzeniowski and Dr. Rubenstein (Doc. 29) and Plaintiff's Motion to Compel Discovery (Doc. 30). The current deadline is July 26, 2022. This is Defendant's second request to extend the deadline. Counsel for Defendant is on a previously planned family vacation during the week of July 18th (Doc. 32). In defense counsel's absence, another attorney in her firm has been monitoring this case and beginning preliminary drafts of the responses. However, the attorney monitoring the case is now unexpectedly out of the office, making Defendant's compliance with the current deadline difficult.

This Stipulation is made in good faith and is not intended for purposes of delay.

Dated this 21st day of July 2022.

/s/ Robert J. Rosati (w/ permission)
ROBERT J. ROSATI

Attorneys for Plaintiff ELIA GARCIA

Dated this 21st day of July 2022.


/s/ Kristina N. Holmstrom
KRISTINA N. HOLMSTROM

Attorneys for Defendant LINCOLN LIFE ASSURANCE
COMPANY OF BOSTON

ORDER

IT IS SO ORDERED.

Dated: July 22, 2022



United States Magistrate Judge